



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

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Allison Ray
WSDOT Environmental Coordinator
AWV Project Office
9993rd Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

The purpose of this letter is to provide you with comments from the Federal Transit Administration (FTA) on the SR 99: Alaskan Way Viaduct & Seawall Replacement Project Draft Environmental Impact Statement (DEIS). As you are aware, FTA is a federal cooperating agency for this National Environmental Policy Act (NEPA) analysis. As such, FTA would typically review the EIS for transit-related impacts. However, given the dramatic style change for this document and understanding that the Washington State Department of Transportation (WSDOT) may wish to use a similar approach for future NEPA documents that may have FTA as a federal lead or co-lead agency, we have reviewed the DEIS in greater detail.

We commend WSDOT and FHWA on the new approach. We appreciate your consideration of the attached comments and look forward to continued collaboration on transportation projects in Washington. Please contact Jennifer Bowman at 206.220.7953 if you have any questions.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosure

cc: Kim Farley, WSDOT
Carol Lee Rolkvam, WSDOT
Sharon Love, FHWA

General

The document makes good use of graphics and has good style and tone. The new format seems to be more readable for the general public. While we are encouraged by the new approach and abbreviated length geared toward the general public audience, we are concerned that the document may not have suitably balanced the information needs of various federal, state and local agencies that use NEPA documents to determine compliance with applicable laws and as supporting material for permitting actions. With this new approach, it becomes necessary to review nearly 3500 pages of appendices to understand what is supporting the generalized statements in the DEIS. Because the document lacks some of the more traditional tables and impact summaries, reviewing this EIS required significantly more time than under the normal approach. We have included below, several ideas for your consideration to continue to improve the quality and format of environmental analyses.

In an introductory section, or perhaps in an executive summary, one suggestion would be to include an explanation of how this EIS differs from previous EIS reports, what things remain the same and how the reader can find information on specific topical interests. Similarly, more detail in the table of contents would help the reader find specific information and make comparisons between alternatives.

Because this new format lacks the standard numbering convention, FTA found it difficult to follow an impact category through each alternative, construction impacts and mitigation. FTA recommends that the questions be grouped into categories and listed in the table of contents for each alternative, construction impacts and mitigation. In addition, a summary of impact areas for all alternatives, presented in a tabular or matrix format, would be helpful.

For main impact categories with associated federal or state laws, it would be helpful to present the reader with a brief description of applicable regulatory standards and thresholds. Enough detail should be given to clearly demonstrate compliance or the methodology to gain compliance.

The DEIS indicates that the FEIS will include detailed mitigation plans for several impact categories for the preferred alternative. Since the FEIS will be the first time that the public and agencies will have an opportunity to review these mitigation plans, FTA recommends that the ROD respond to any comments received on these plans.

The DEIS does not clearly state the process for determining the preferred alternative. The FEIS for this project should describe how the decision was made. Future documents that take this approach should include a description of the decision-making structure and process.

Air Quality--Construction

FTA understands that the FEIS will present an analysis of construction pollutant emissions in the FEIS. Given that the highest rates of air pollution emissions are generated by diesel powered construction equipment and marine vessels that may be used to support maritime construction operations and the construction period will exceed eight years, we request that the FEIS also describe the emissions reduction strategies to which the project will commit. In addition, since this information was not included in the DEIS, FTA requests that any comments received on air quality impacts during the construction period as presented in the FEIS be addressed in the ROD.

Alternatives

Page 55 states that screening tools were used in evaluating ideas for the alternatives. The FEIS should describe the screening process in greater detail.

Bike and Pedestrian Access and Safety

The FEIS should present a map showing bike and pedestrian routes throughout the project area for the construction period and for the finished project. This should include the SR 519 area, the Waterfront Trail and access to Colman Dock.

Businesses

FTA encourages the project sponsors to present in the FEIS a mitigation plan with detailed strategies for mitigating construction impacts to the local businesses especially with respect to access both from the land and water. FTA also recommends that the ROD respond to any comments received on these plans.

Environmental Justice

Since a detailed EJ analysis will not be available until the preferred alternative is presented in the FEIS, FTA recommends that the ROD respond to any comment received on this topic.

P. 68, question 13 states that Casa Latina will be relocated. Given the difficulty associated with the original siting of this facility, have any feasible relocation alternative been identified?

Ferries

Since the proposed project will significantly change access to Colman Dock, the FEIS should provide detailed information, including a map that shows ingress and egress for the ferry terminal, including pedestrian access, and the auto holding areas.

Financial Analysis

FTA considers it helpful for agencies and the public to have more information on the financial analysis of the project, including construction, maintenance and financing options for the project. FTA recommends that the FEIS present more financial information on the preferred alternative.

Fisheries, Wildlife and Habitat

Page 49 states that the Department of Ecology has designated Elliott Bay as excellent in terms of goals for quality and aquatic life. Similar information is not presented for the other water bodies in this section. It would help the reader understand the context and significance of this if similar information were presented for all water bodies in the project area and if the significance of these designations were explained. A general overview of applicable standards would be helpful.

FTA does not understand the basis for the preliminary “not likely to adversely impact” determination for Chinook salmon and bull trout that is presented in Appendix R. As a cooperating agency, please keep us informed as you go through the section 7 consultations.

Haul Routes

Haul routes are unclear. If either of the tunnel alternatives is chosen, haul routes will be very important. FTA recommends that the FEIS present a detailed analysis of the haul routes and impacts thereof if either tunnel option is chosen.

An analysis of marine construction and supply provisioning options versus land-based techniques should also be presented.

Historic Resources

FTA is required to analyze the impacts of public transportation projects on park resources as required by 49 U.S.C. 303 Section 4 (f) and 23 Code of Federal Regulations 771.135. In the FEIS, FTA would like to see how the new pier between pier 46 and Colman dock would impact the footprint of the Washington Street Boat Launch. The actual footprint of the park in its current location is unclear. Will the in-water portion of this park resource be extended to keep its original size or will the in-water portion simply be covered up? This may have an impact on passenger-only ferry routing and docking. FTA would like to see a delineation of the park resource with the new project in place.

Maps and Graphics

The EIS’s use of visual simulations and graphic is very helpful.

More detailed maps would help the reader understand the project and its impacts better. A compromise between the DEIS general level and the Appendix W would be helpful for the FEIS.

Travel times are given to and from “downtown” but FTA was unable to determine how this is defined. Please clarify this in the FEIS.

P. 9 Average Traffic Speeds graphic. We have assumed that the year of analysis is 2030, but it is not clear. This comment applies to similar maps and graphics throughout.

P. 23 describes the detour options. Please include a detailed map of the planned detour in the FEIS.

P. 65 (and generally Question 5 for all alternatives) discusses freight access. Please include in the FEIS maps showing interchanges at S. Atlantic Street and S. Royal Brougham Way that are stated to improve access between SR 99 and SR 519.

P. 88 describes new ramps, railroad access and ferry access. Please include a map that shows these movements in the FEIS.

P. 92 discusses traffic impacts on other parallel city streets. The last paragraph on this page is confusing. A map would help.

Noise

What mitigation is proposed for residential properties during the construction period? What consideration has been given to nighttime construction noise traveling over water? How might residences in West Seattle be impacted? Does the project propose limiting the kind of construction activities that will be allowed through the night?

Parking

To better understand the magnitude of parking impacts, it would be helpful to know how many spaces are currently available in each sub area for each kind of parking. The sentence immediately following Question 7 (p 66 and subsequent sections for each alternative) seems inconsistent with the last sentence in the second paragraph of this section (2,038 spaces versus 2,800 spaces).

FTA encourages the project sponsors to coordinate with transit providers, vanpools, carpools and the flex car program in developing the parking mitigation plan that is to be presented in the FEIS.

Public Services

All build alternatives propose relocating Fire Station #5. Will this station be relocated and operational during the construction period? FEIS should identify the new location or possible locations.

Relocations

Question 14 in each alternative deals with property acquisition. The DEIS states that "No residences would be affected." Certainly residences in the project area will be affected by noise, limited access and constant changes in traffic patterns. Perhaps clearer wording would be "No residences would be acquired."

Staging Areas

The DEIS states that the City-owned property west of the Battery Street Tunnel will be used for construction staging. What are the other staging areas? The FEIS should describe all potential staging areas.

Surface Alternative

Surface Alternative is the least costly alternative. It moves the fewest vehicles at the slowest pace and has the potential to create significant congestion impacts in the downtown and on I-5. If this were to be selected as the preferred alternative, the FEIS should describe the transit components that would be necessary to maintain a functioning metropolitan transportation system with an agreed upon level of service needed to support commerce and a high quality of life for the public.

If the Surface Alternative is chosen as the preferred alternative, FTA recommends that a quantitative assessment of general traffic, transit and air quality impacts to I-5 and mitigation

commitments be presented in the FEIS. In addition, since this information was not included in the DEIS, FTA requests that any comments received on this matter be addressed in the ROD.

Transit

FTA is very interested in the Flexible Transportation Package. Since many of its elements may be eligible for FTA funding, we request that the project sponsors and transit providers coordinate with FTA as this is developed.

All alternatives remove the Waterfront Streetcar during the construction period. One possible way to mitigate this loss would be to use a rubber-tired transit vehicle as an alternative for the duration of the construction period. This option would not only provide safe and controlled passage over an ever changing right of way through a construction zone to pedestrians, customers of waterfront businesses and residents, but could provide mobility for project work crews given limited on site parking.

Appendix J: Environmental Justice

Page 3 states, "the City of Seattle will take measures to ensure that transit service in Downtown Seattle does not degrade." The FEIS should describe these measures and the level of commitment to them. It should also describe the coordination process among the various transit agencies that provide service to the area. In addition, since this information was not included in the DEIS, FTA requests that any comments received on transit service during the construction period as presented in the FEIS be addressed in the ROD.